

**Before The
Federal Communications Commission
Washington, D.C. 20554**

In The Matter Of)	
)	
Universal Service Gigabit Communities)	WC RM No. 11703
Race to the Top Program)	
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**COMMENTS OF THE
SCHOOLS, HEALTH & LIBRARIES BROADBAND (SHLB) COALITION**

September 11, 2013

The Schools, Health and Libraries Broadband (SHLB) Coalition (“SHLB Coalition”)¹ is pleased to file these brief comments (in response to the Public Notice issued by the Consumer and Governmental Affairs Bureau on August 12, 2013) in support of moving forward with the Fiber to the Home Council’s Race to the Top Gigabit Communities Petition for Rulemaking

The SHLB Coalition is a broad-based coalition of organizations that share the goal of promoting open, affordable, high-capacity broadband for anchor institutions and their communities.² High-capacity broadband is the key infrastructure that K-12 schools, community colleges, colleges and universities, libraries, health clinics, public media and other anchor institutions need for the 21st Century. Enhancing the broadband capabilities of these community anchor institutions is especially important to the most vulnerable segments of our population – those in rural areas, low-income consumers, disabled and elderly persons, students, minorities, and the disadvantaged members of our society.

Providing high-capacity bandwidth to community anchor institutions (CAIs) is one of the most important actions that the Commission can take to improve the nation’s readiness to meet the challenges of the 21st Century. The broadband needs of CAIs are often overlooked, but their demand for high-capacity broadband grows more urgent every day.

¹ “SHLB Coalition” is pronounced “SHELL-bee Coalition.”

² Our members include representatives of schools, health care providers, libraries, private sector companies, state and national research and education networks, foundations, state broadband mapping organizations, and consumer organizations. See www.shlb.org for a complete list of SHLB Coalition members.

Community anchor institutions provide a wide variety of Internet-based services to the community, including distance learning, public access computing, digital literacy training, telemedicine, job training, and basic research. Community anchor institutions also serve the disabled, the elderly, low-income people, and other vulnerable members of the community who might not otherwise have access to the Internet. In short, broadband is an essential component of the increasingly valuable and diverse array of services that these institutions provide to **all** members of the community, not just residential consumers.

Unfortunately, there is clear and mounting evidence that community anchor institutions do not have sufficient broadband services to meet the needs of their communities today, such as:

- An FCC survey of E-rate participants found that “[n]early 80% of all [schools and libraries in the E-rate program] say their broadband connections do not fully meet their current needs.” (In fact, 20% of E-rate participants state that broadband services meet their needs sometimes, rarely, or not at all).³
- One-third of school technology leaders (34 percent) identified Internet capacity and bandwidth issues as their most challenging technology issue today, and only 15 percent of district administrators and technology leaders said they have enough connectivity to meet current needs;⁴
- A recent report from the Horizon Foundation concluded that community colleges’ infrastructure is under-resourced, that personalized learning is not adequately supported by current technology, and that the digital divide remains an issue, particularly given the socio-economic diversity of the community college population.⁵
- A survey of school IT leaders conducted by the Consortium for School Networking (COSN) found that the top 3 priorities that IT leaders named for 2012-13 are Bring Your Own Device (BYOD) programs, assessment readiness, and broadband access. According to COSN, “these priorities reflect the growing focus on the Common Core State Standard initiative for online assessments and the need for schools and districts to prepare for these assessments. The recent Assessment Readiness Survey by Partnership for Assessment of Readiness for College and Careers (PARCC)

³ 2010 E-Rate Program and Broadband Usage Survey: Report, Federal Communications Commission, Wireline Competition Bureau, DA 10-2414, released Jan. 6, 2011, available at www.fcc.gov.

⁴ “From Chalkboards to Tablets: The Digital Conversion of the K-12 Classroom,” Speak Up 2012 National Findings K-12 Educators and Parents, April 2013, p. 14 (available at http://www.tomorrow.org/speakup/SU12_DigitalConversion_EducatorsReport.html).

⁵ Johnson, L., Adams Becker, S., Cummins, M., Estrada, V., Freeman, A., Ludgate, H. (2013). Technology Outlook for Community, Technical, and Junior Colleges 2013-2018: An NMC Horizon Project Sector Analysis. Austin, Texas: The New Media Consortium.” pp 19-20.

(www.parcconline.org) found that 80% of schools will not meet the requirements for online assessments.”⁶

- The National Broadband Plan found that 29% of the 3700 rural health care clinics were located in areas where mass-market broadband was not available. The Plan then noted that most health clinics need much greater capacity than 4 Mbps capacity typically available to households, so the number of rural health clinics who do not have access to high-capacity broadband is much higher than 29%.⁷

The need for high-capacity broadband services will become even more urgent over the next few years. K-12 schools need to comply with the national Common Core testing requirements beginning in 2014, and many schools need more broadband capacity to satisfy these testing requirements.⁸ Furthermore, public education is increasingly embracing individualized, “personalized learning” that uses technology in the classroom.⁹ Public libraries are increasingly using technology to provide digital literacy training, offering “maker spaces” to young entrepreneurs, supporting e-books, and providing on-line access to e-government, health and job training services.¹⁰ Hospitals and health clinics are making

⁶ See CoSN’s K-12 IT Leadership Survey 2013, available at <http://www.cosn.org/Default.aspx?TabId=14326>.

⁷ See, “Connecting America: The National Broadband Plan,” released March 17, 2010, Chapter 10.

⁸ “Bandwidth Demands Rise as Schools Move to Common Core,” EducationWeek, Oct. 15, 2012, (<http://www.edweek.org/dd/articles/2012/10/17/01bandwidth.h06.html>.); “Rural Schools Struggle to Prepare for Common Core’s Online Tests,” StateImpactOhio, March 21, 2013, (<http://stateimpact.npr.org/ohio/2013/03/21/rural-schools-struggle-to-prepare-for-common-cores-online-tests/>).

⁹ According to the U.S. Department of Education:

technology infuses classrooms with digital learning tools, such as computers and hand held devices; expands course offerings, experiences, and learning materials; supports learning 24 hours a day, 7 days a week; builds 21st century skills; increases student engagement and motivation; and accelerates learning. Technology also has the power to transform teaching by ushering in a new model of connected teaching. This model links teachers to their students and to professional content, resources, and systems to help them improve their own instruction and personalize learning.

“Use of Technology in Teaching and Learning” (<http://www.ed.gov/oii-news/use-technology-teaching-and-learning>.)

¹⁰ According to the Information Policy and Access Center at the University of Maryland (which issues the Public Library Funding and Technology Access Studies):

The technology training services offered by libraries are an important component of the services they provide to the community, with 90.2% of libraries offering some type of training (see Figure 1). Librarians report that usage of patron technology training classes has increased at 36.3% of libraries and only 4.5% report a decrease. Librarians recognize the value of these services, ranking technology training 3.8 out of 5 in terms of the importance of services offered to the community (5 being the highest importance).

<http://ipac.umd.edu/survey/analysis/digital-literacy-public-libraries>.

increasing use of electronic medical records and the use of telemedicine is growing.¹¹ All of these trends will require anchor institutions to have much more Internet capacity than they have today.

For these reasons, the SHLB Coalition supports pursuing the Fiber to the Home Council's Race to the Top Gigabit Communities petition. This proposal would help address the rapidly expanding needs of anchor institutions in rural communities for more open, affordable, high-capacity broadband. We urge the Commission to move forward with this proposal.

Respectfully Submitted,

A handwritten signature in black ink that reads "John Windhausen, Jr." with a stylized flourish at the end.

John Windhausen, Jr.
Executive Director
Schools, Health & Libraries Broadband (SHLB) Coalition

September 11, 2013

¹¹ See, "The Doctor Will Skype You Now," Bloomberg BusinessWeek, August 21, 2012, available at <http://www.businessweek.com/articles/2012-08-23/the-doctor-will-skype-you-now>. ("Increased broadband availability and lower costs for the technology are helping telemedicine spread, says Thomas Nesbitt, University of California Davis's associate vice chancellor for strategic technologies and alliances.")